

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

<b>In re:</b>	)	
	)	
<b>GLYN NEAL OWEN,</b>	)	<b>Case #25-11132-KHK</b>
	)	<b>(Chapter 11)</b>
<b>Debtor-In-Possession.</b>	)	
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**SUPPLEMENTAL OBJECTION TO CLAIM OF EXEMPTIONS**

CGH Technologies, Inc. (“CGH”), a creditor in the above-captioned case, by counsel, hereby supplements its objection (Doc 37) under F.R.Bankr.P. 4003(b)(1), to the Debtor’s claim of exemptions, to add the ground set forth herein:

**Background**

The Debtor commenced this case by filing a voluntary petition under Chapter 11 of the Bankruptcy Code on June 4, 2025. The creditors’ meeting was commenced on July 10, 2025 and concluded on July 17, 2025.

On June 23, 2025, the Debtor filed his Schedule C with this Court (Doc 26 at 13-15), claiming certain of his assets as exempt. Among the assets claimed as exempt is the Debtor’s interest in an Athene IRA Annuity account (the “Annuity”). The Debtor has claimed the entirety of the account’s \$655,171.71 value as exempt under Virginia Code § 34-34, which exempts “a retirement plan . . . from creditor process to the same extent permitted under federal bankruptcy law for such a plan.” § 34-34(B).

**Argument**

CGH objects to the Debtor’s exemption of the Annuity to the extent that the source of the funds deposited into the Annuity were other than funds rolled over from the Debtor’s own 401(k)

plan at CGH Technologies, Inc. or permissible IRA contributions into the Annuity made thereafter.

WHEREFORE, the Trustee respectfully requests that the Court sustain this Supplemental Objection and grant such other and further relief as it deems just and appropriate.

CGH TECHNOLOGIES, INC.  
By counsel

/s/Steven B. Ramsdell  
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**CERTIFICATE OF SERVICE**

I hereby certify that on this 18<sup>th</sup> day of August, 2025, a true copy of the foregoing Supplemental Objection was served on all parties registered to receive service through the Court's ECF system and was mailed first-class, postage prepaid, to.

Glyn Neal Owen  
1131 Tournai Ct.  
Woodbridge, VA 22191

/s/Steven B. Ramsdell  
Steven B. Ramsdell